## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion, pursuant to G.L. c. 159, §§ 12 and 16, into the collocation security policies of Verizon New England Inc. d/b/a Verizon Massachusetts

DTE 02-8

## PETITION OF AT&T COMMUNICATIONS OF NEW ENGLAND, INC. FOR LEAVE TO INTERVENE

AT&T Communications of New England, Inc. ("AT&T") petitions pursuant to 220 C.M.R. §1.03 for leave to intervene as a party to this proceeding. The business address of AT&T is 99 Bedford Street, Boston, Massachusetts 02111.

- 1. AT&T is a common carrier of telecommunications services authorized by the Department to provide both interLATA and intraLATA services in Massachusetts.

  AT&T purchases collocation services from Verizon New England, Inc. d/b/a Verizon

  Massachusetts ("Verizon"). AT&T also competes with Verizon in the provision of telecommunications services in Massachusetts.
- 2. AT&T was a party to, and an active participant in, all aspects of the proceedings in DTE 98-57, in which the currently effective collocation security policies were litigated and determined. Those policies provide for the access of personnel of AT&T and other CLECs to their equipment in collocation arrangements in Verizon buildings.
- 3. The present docket has been established by the Department to consider, *inter alia*, whether there is a need to modify currently effective arrangements for access of personnel of AT&T and other CLECs to their equipment in collocation arrangements.

  Just as AT&T had in interest in the collocation security arrangements established in

D.P.U. 98-57, AT&T has an interest in any possible modification of those arrangements in this docket.

- 3. For the foregoing reasons, AT&T will be substantially and specifically affected by the Department's investigation in this docket. AT&T intends fully to participate in the proceedings in this docket.
  - 4. AT&T will be represented in this docket by counsel, as follows:

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Jeffrey F. Jones, Esq Kenneth W. Salinger, Esq. Jay E. Gruber, Esq. Palmer & Dodge LLP One Beacon Street Boston, MA 02108 (617) 573-0449

5. AT&T requests that all papers served on it in connection with this proceeding be served on counsel at the addresses above and on Dr. Patricia Jacobs, 99 Bedford Street, Boston, Massachusetts 02111.

For the foregoing reasons, AT&T requests that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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